1. Section 3.3.1: Something needs to be inserted here on TSS/TP affecting biology (could use the discussion from page 12)
2. Our NPDES program would like the 2 pre-treatment sites removed from the list (Allomatic Products and North American Latex). Since these sites do not discharge to a navigable water, no WLA is needed.
3. Section 4.2.3, page 23: The references in this section need to be changed to IDEM, as this will be an IDEM TMDL.
4. Section 6.1, page 26: the units seem inconsistent. Aluminum is 0.174 µg/l on page 26, and is 174 µg/l on page 27.
5. Section 6.2.1: The sentence "The pH TMDL is based upon meeting…" should be changed to "The pH **impairment will be addressed by** meeting …" and reference the discussion on page 13. this would apply to any other pH TMDL discussion in the document.
6. Section 6.2.3: Just want to confirm the WLA for Hymera is based upon the design flow and a concentration of 0.3 mg/l TP. Is the IDEM NPDES program aware of this WLA?
7. Section 6.2.6: In the next to last paragraph, "IDEM has determined, in accordance with this study…" Which study is referenced here, the USGS study, or this TMDL study?
8. Section 6.2.9: Kettle Creek is "potentially impaired"?
9. Table 35: Concur with SDM37 comment – the MOS = 0 needs to be explained in **great** detail.
10. Section 6.3: This may need to be expanded. I will look for language to send.
11. Section 6.4.1: Were the CSOs rolled into the WLAs for the WWTPs? They are discussed as a source, but nothing else is mentioned.
12. Section 6.5: This section needs to be expanded. For seasonality, the discussion should include using the 35 years of daily flow data, which will account for seasonal variations in flow and related loads. Figure 4 could also be referenced, showing the spring higher flows and summer lower flows. For critical condition, it appears the loads are mainly precipitation-driven, and therefore using the LDC method allow the State to target the BMPs/ other implementation measures to address these loads. The critical condition for water quality impacts may not be apparent at this time, at least for metals, as the toxic impacts occur under multiple conditions (???)
13. Table 1: Should the "Update Cause of Impairments" be changed to "2008 303d Cause of Impairments?"
14. How do the segments in Table 1 relate to those in Table 2? Certain segments are identified in Table 1, but are not captured in Table 2. It would be helpful to identify the TMDLs developed for each station in Table 2, which would consequently show those segments that are addressed by the loadings.
15. Appendix D: what does "E," "F," and "G" stand for? Does "diss" mean "dissolved?"
16. Appendix D: Seems that Nickel data should be removed from the appendix since no nickel TMDL was done.

17. Page 14/Appendix D: States that “total recoverable criteria” was used to determine loadings. It is unclear where this criteria is in Appendix D. Are the total recoverable criteria values the same as the “CAC” value?
18. Page 15 implies the biotic community will attain standards by meeting all the loads in Table 5; however, Page 16 indicates that the cause of impaired biota is attributed to iron and aluminum. Identify which pollutants are the actual surrogates for the biotic community.
19. Page 19, Sec. 4.1.1: Is this section is referring to Figure 6, Table 8? The paragraph also mentions industrial discharger associated with mining but does not identify which of the 22 NPDES permits are classified as such.
20. The TMDL should make the distinction between abandoned mines, historical mines, current mines (does this mean “active mines”?), abandoned mines, abandoned “non-reclaimed” mines, and underground mines. The report refer to these different type but it is unclear if the terminology describes the same type of mine, or if each mine is distinguishable in some way. The report does make it clear that abandoned mines are treated as NPS, but does not indicate how the other types are classified.
21. Page 34: Should the bullet point identifying TSS be removed?
22. Table 18: Since the source of aluminum is abandoned mines and abandoned mines are classified as NPS, it is unclear why WLAs are assigned and why the existing “point source” column reads “unknown,” as opposed to “No Point Source.”
23. Page 38: The TMDL should identify the station number (as shown in Appendix F) for which data was used by the DNR and USGS, as done for other segments.
24. Page 38: the language regarding pH may need to be removed from this section.
25. Page 41: same comment as #23.
26. Page 44: I believe the first sentence is referring to Table 30. Currently says: “…. summarized in 0.”
27. Page 44: Of the three NPDES facilities listed by bullet points, which is a source of aluminum, and which is a source of TSS?
28. Page 44: This section should indicate how an “inactive” mine is defined. Should also state why it’s appropriate to give an “inactive” mine a zero WLA.
29. Page 45: Of the four NPDES facilities listed by bullet points, which is a source of aluminum, iron, and TSS?
30. Page 45: Same comment as #22.
31. Page 47: Says to refer to section 3.1 for details, but I believe it is referring to section 3.0.
32. Table 34: The table indicates a 0 load allocation, which implies that NPS contributions will be completely eliminated from the stream. The MOS = 0 also implies that there was no uncertainty when calculating the load. Would suggest that some portion of the total allocation account for NPS, and that the implicit MOS is described.
33. Page 49, Sec. 6.3: This section should be expanded to explain why the 10% MOS is also appropriate for the TSS and phosphorus loadings, as well as for those waters where no flow data was available.